REMARKS

Claims 1-6 are pending.

Claims 1-6 stand rejected.

Claims 1, 3, and 4 have been amended for clarity.

Claims 7-33 have been added. Applicants respectfully submit that the new Claims are supported by the Specification of the Present Application, and, thus, no new matter has been added.

Specification Objection

The specification stands objected to because the abstract contains other information, such as the title and inventors names. Applicants have amended page 30 containing the Abstract to delete the first paragraph containing the title and inventors' names.

Applicants respectfully request withdrawal of the objection.

Claim Rejections - 35 U.S.C. § 103

Claims 1-6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,496,842 issued to Lyness (referred to herein as "*Lyness*"), and in view of U.S. Patent No. 6,166,739 issued to Hugh (referred to herein as "*Hugh*"). Applicants respectfully traverse the rejection.

Applicants respectfully submit that even assuming that the Examiner's cited teachings of *Lyness* and *Hugh* are properly combinable, *Lyness* in combination with *Hugh* fails to teach or suggest the present invention of Claims 1-33.

Claim 1.

Lyness relates to, "Hierarchies [that] are navigated easily through a user interface that is continuous in its presentation of node information and may be implemented using a small display space." *Lyness*, Absract. More specifically, *Lyness* teaches that:

> Implementations of the invention present in a limited display area a view of the hierarchy that can be changed under user control. At any one time the view

is "focused" or centered either at one node or between nodes, and contains all nodes surrounding this center of view or "Focus". A user may see one of these surrounding nodes and manipulate the Focus toward that node so that all nodes surrounding that node are now in view. By continued navigation of this sort, and exploiting the fact that any node in the hierarchy can be reached from any other node by a series of steps through intermediate nodes, the user may view any point in the entire hierarchy. Methods discussed below make this navigation experience "smooth"--the Focus changes gradually, and the resulting changes in the view are "animated" or rendered in many small steps. *Lyness*, col. 5, line 53-67.

Applicants respectfully submit that, although *Lyness* is directed towards the display and navigation of hierarchies, *Lyness* does not teach or suggest how to display or navigate the **type of hierarchy** of the Present Invention. For convenience, Applicants have reproduced a copy of an illustrative example type of hierarchy taught by *Lyness*:

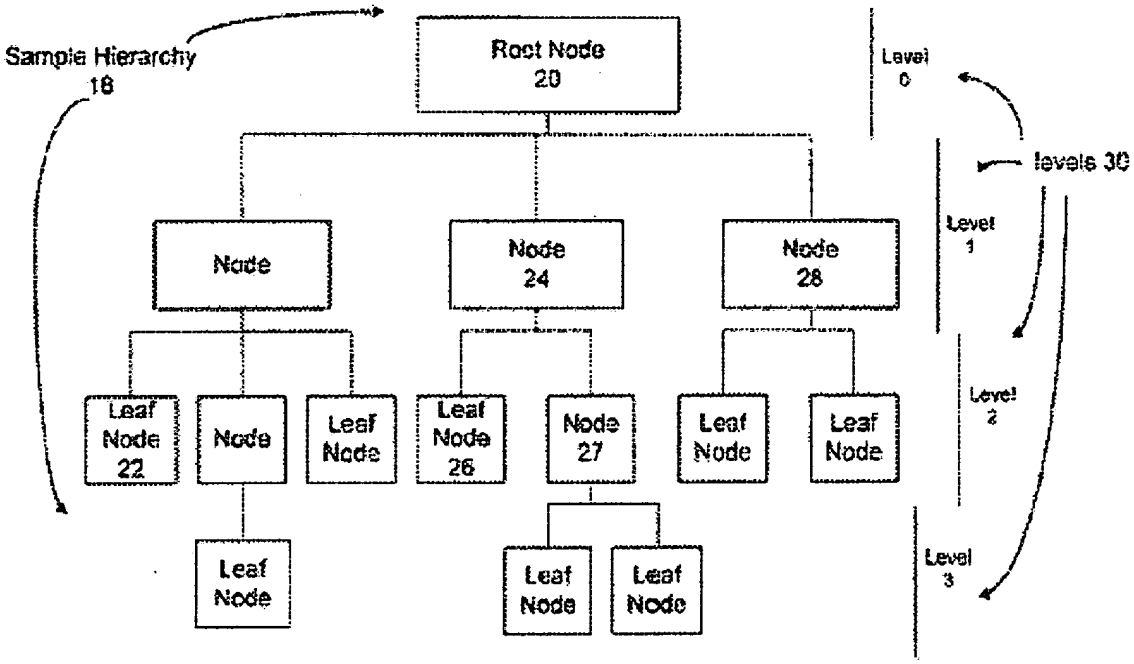

Figure 1

As evident in, for example, Figure 1 of *Lyness*, Applicants respectfully submit that *Lyness* fails to teach or suggest a method for navigating and displaying a plurality of relational objects wherein:

the plurality of relational objects comprise a node link structure;

the node link structure further comprising a plurality of hierarchies of nodes;

a first of the plurality of hierarchies shares the common node with a second of the plurality of hierarchies;

the common node has a first parent node in the first hierarchy and a second parent node in the second hierarchy;

the common node is a parent node for a first child sub-tree of one or more nodes in the first hierarchy and is a parent node for a second child sub-tree of one or more nodes in the second hierarchy; and

the first hierarchy does not include the second child sub-tree of one or more nodes. Claim 1.

Hugh relates to "An effect method and apparatus for organizing and processing chunks of interrelated information (or "thoughts") using a digital computer is disclosed." *Hugh*, Abstract. "The invention utilizes highly flexible, associative thought networks to organize and represents digitally-stored thoughts." *Id.*

Hugh also fails to teach or suggest:

a first of the plurality of hierarchies shares the common node with **a second of the plurality of hierarchies**;

the **common node** has **a first parent node in the first hierarchy** and a **second parent node in the second hierarchy**;

the **common node** is **a parent node** for **a first child sub-tree** of one or more nodes **in the first hierarchy** and is **a parent node** for **a second child sub-tree** of one or more nodes **in the second hierarchy**; and

the first hierarchy does not include the second child sub-tree of one or more nodes. Claim 1.

Hugh includes the following example tree structures in Fig. 18:

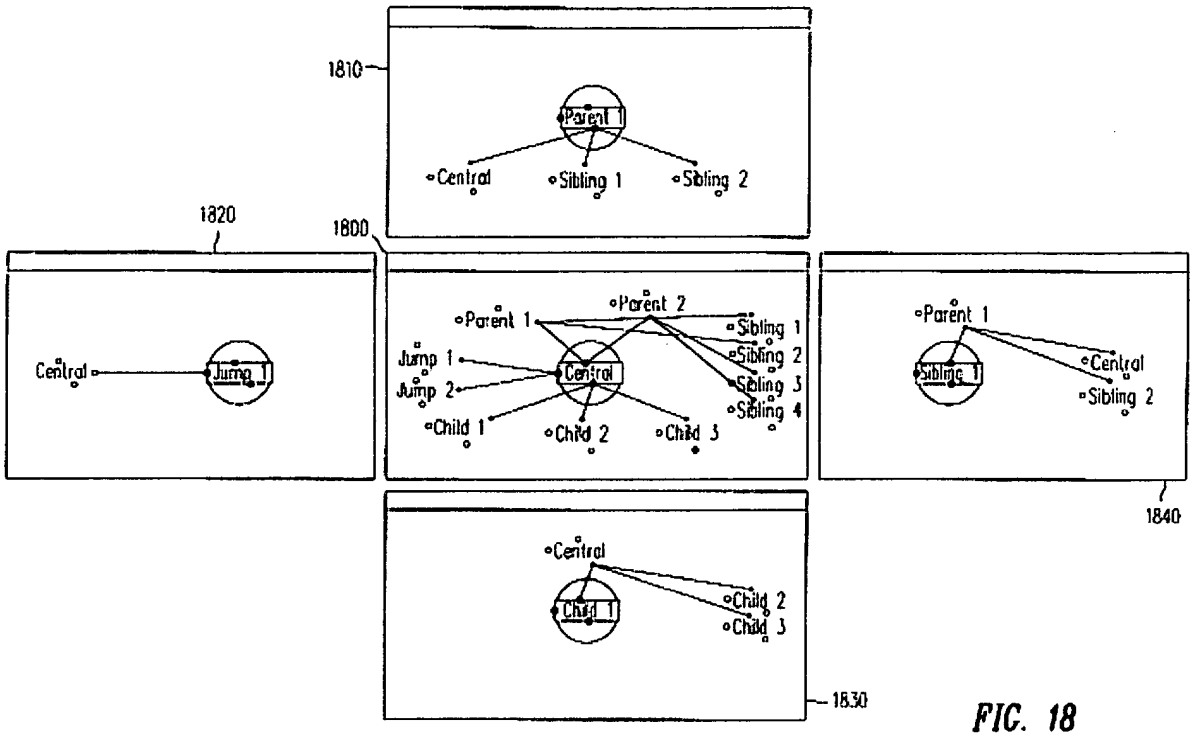

FIG. 18

In Fig. 18 of *Hugh*, Parent 1 and Parent 2 are both grandparents all three "Child 1, Child 2, and Child 3". See, *Hugh*, col. 12, line 65 – col. 13, line 5 ("Child 2 and Child 3 are displayed as siblings of Child 1" and "Parents 1 and 2 would now be grandparents."). Thus, *Hugh* fails to teach or suggest that "the **common node** has **a first parent node in the first hierarchy** and a **second parent node in the second hierarchy" AND "the first hierarchy does not include the second child sub-tree of one or more nodes**" as required by Claim 1.

Since neither *Lyness* nor *Hugh* teach or suggest ""the **common node** has **a first parent node in the first hierarchy** and a **second parent node in the second hierarchy" AND "the first hierarchy does not include the second child sub-tree of one or more nodes**" it is not possible for *Lyness* in combination with *Hugh* to teach what neither teach alone.

This distinctions between Claim 1 and the combined teachings and suggestions of *Lyness* and *Hugh* are non-trivial. The Present Applicant states that "the inventors have determined that it is beneficial to utilize an interface that presents information to a user from a graph that includes

at least one shared common node but does not re-use the full child sub-tree for the common node among the hierarchies." Present Application, p. 11, lines 7-9. This is not possible to achieve from the combined teachings of *Lyness* and *Hugh*. Although the claims are not limited to specific embodiments in the Present Application, the benefit expressed in the Present Application, p. 11, lines 7-9 can generally apply to the invention of Claim 1.

Claims 9, 15, 21, 27, and 33.

Applicants respectfully submit that independent Claims 9, 15, 21, 27, and 33 are also allowable over the *Lyness* in view of *Hugh*.

For conciseness, Applicants refer the Examiner to the above discussed teachings of *Lyness* and *Hugh*. Accordingly, Applicants respectfully submit that *Lyness* in view of *Hugh* neither teaches nor suggests:

> the **focus node** is one of the plurality of nodes and **is a common node of a first hierarchy of nodes and a second hierarchy of nodes**;
>
> the plurality of nodes are included in a node link structure;
>
> the plurality of nodes include the first hierarchy of nodes and the second hierarchy of nodes;
>
> **the common node has a first parent node in the first hierarchy** of nodes and **has a second parent node in the second hierarchy** of nodes;
>
> the **common node is a parent node for a first child sub-tree** of one or more nodes in the first hierarchy **and is a parent node for a second child sub-tree** of one or more nodes in the second hierarchy; and
>
> **the first hierarchy does not include the second child sub-tree** of one or more nodes;
>
> **identifying** [identifies, Claim 15] **a context of the focus node**, wherein the context is associated with one of the first hierarchy of nodes and the second hierarchy of nodes; and
>
> display the focus node and the one or more nodes of the child sub-tree of the hierarchy of nodes determined to be associated with the context of the focus node.

In light of the above remarks, Applicants respectfully request withdrawal of the rejection of independent Claims 1, 9, 15, 21, 27, and 33.

Dependent Claims.

Applicants respectfully request withdrawal of the rejection of the dependent claims for at the same reasons as the independent claims upon which dependent claim depends.

CONCLUSION

In view of the amendments and remarks set forth herein, Applicant respectfully submits that all pending claims are in condition for allowance. Accordingly, Applicant requests that a Notice of Allowance be issued. Nonetheless, should any issues remain that might be subject to resolution through a telephone interview, the Examiner is requested to telephone the undersigned at 512-338-9100.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, COMMISSIONER FOR PATENTS, Alexandria, VA 22313-1450, on December 15, 2005.

Attorney for Applicant(s) — Date of Signature: 12-15-2005

Respectfully submitted,

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